

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MARION

Chad Mangum,

-V-

State of Oregon, acting by and through the
State Board of Tax Practitioners,

PLAINTIFF'S MOTION FOR ORDER TO
SHOW CAUSE WHY PRELIMINARY
INJUNCTION SHOULD NOT ENTER
AND REQUEST FOR REMOTE
APPEARANCE DUE TO HARDSHIP

ORAL ARGUMENT NOT REQUESTED

Plaintiff does not request oral argument concerning this motion. Plaintiff remains available to appear if the Court believes oral argument would assist in its consideration of the matter. Plaintiff does not request official court reporting services.

Pursuant to ORCP 79, Plaintiff respectfully moves the Court for an order requiring Defendant to appear and show cause, if any, why a preliminary injunction should not be entered as requested in Plaintiff's motion filed March 3, 2025, and remain in effect during the pendency of this action. Plaintiff has no adequate remedy at law.

Notice of this motion has been given to Defendant's lawyer.

1 Plaintiff further requests that the hearing be scheduled as soon as possible, within five
2 days of this filing if the Court permits, or sooner if the Court finds that Plaintiff's original
3 motion—filed 49 days prior and provided to Defendant—provided sufficient advance notice of
4 impending action. This request is made due to the urgency created by imminent and ongoing
5 threats of enforcement by Defendant.

6 This motion is supported by the Complaint, the Motion for Preliminary Injunction,
7 Plaintiff's Memorandum in Support, and the exhibits previously filed. A proposed Order to
8 Show Cause is submitted herewith for the Court's convenience.

9 Plaintiff also respectfully requests to appear at the hearing remotely, pursuant to UTCR
10 5.020. Plaintiff is representing himself pro se in this matter, from Utah. Defendant is a state
11 agency whose actions gave rise to this litigation, and it would be inequitable and financially
12 burdensome to require Plaintiff to travel to Marion County for a hearing necessitated by those
13 actions.

14 Plaintiff is a single parent of a school-aged child. School is currently in session. Plaintiff's
15 co-parent resides out of state (not in this state—Florida), and he has no family or support system
16 within reasonable distance; the closest familial ties are located approximately 3.5 hours away.
17 The cost and logistical hardship associated with in-person attendance make it functionally
18 impossible for Plaintiff to appear in person.

1 DATED this 18th day of April, 2025.

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3 RESPECTFULLY SUBMITTED,

4 CHAD MANGUM
5 Plaintiff

6 /s/ Chad Mangum
7 CHAD MANGUM
8 Plaintiff
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